Comments of AT&T on SBC/Ameritech Plan of Record
(As Revised March 1, 2000)

The Commission on February 15, 2000 voted unanimously to reject

SBC/Ameritech's first attempt at a Plan of Record for Operations Support Systems

(OSS). The discussion at that time conveyed unambiguously the views of the

Commissioners that the document SBC/Ameritech had presented was "appallingly

vague" and "deficient." The Chairman's subsequent letter of February 17, 2000 gave

SBC/Ameritech concrete guidance on what elements needed to be added and what

needed to be remedied to produce a document adequate to proceed to the collaborative

stage.

The Plan published by SBC/Ameritech on March 1 is a surprisingly feeble

response to these concerns. The document is thicker, but mostly as a result of the

addition of a variety of attachments, many of which are irrelevant or not particularly

useful.[1] On the key issue of the extent to which SBC/Ameritech intends to comply with

or depart from industry standards, the Plan remains indefinite and incomplete. The

Commission may indeed be surprised at how little of substance is changed from the

previous version. Appended to these Comments as Attachment A is a comparison of the

two documents with the changes shown in "legislative" style (additions are underlined;

deletions are shown by strikethrough). The crucial discussion of SBC/Ameritech's plans

of course appears in the "Future Methods of Operation" section, and as will be seen from

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[1] For example, SBC/Ameritech includes an ordering guide for a GUI pre-ordering interface that is
currently available in SWBT territory accompanied by the promise that an "enhanced" but
otherwise unspecified version will be made available in Ameritech territory in December of 2000.
It also includes specifications for the August 2000 upgrade to Ameritech's Ordering system, but
as will be seen that "upgrade" is at best cosmetic rather than an enhancement toward industry
standards.

Attachment A relatively little has changed. The comments which follow will concentrate

on the preordering and ordering systems, since those are so critical to the ability of

CLECs to pass customer orders on any scale to the ILEC.

I.   **SBC/Ameritech Has Still Not Disclosed The Functionality That Is To Be Included In The Planned Upgrades To Ameritech's Pre-Ordering And Ordering Systems.**

A central issue identified by AT&T in its previous comments is the need to

identify, with specificity, the functionality which SBC/Ameritech plans to incorporate in

up-coming enhancements to its OSS systems. SBC/Ameritech has stated that it plans

updates "consistent" with LSOG 4/EDI 10 for ordering in August of 2000, and for

preordering in March of 2001. But it is possible to be technically "consistent" with the

standards, in whole or in part, and not offer the functionality conveyed with full

"compliance" with the standards, and historically that has been the case with Ameritech.

Attachment A to the Chairman's letter of February 17 highlights this issue:

> The Commission's Order in Docket 98-0555 specifically stated in
> Condition 29 that "Ameritech Illinois will deploy . . . interfaces as defined,
> adopted, and periodically updated by industry standard setting bodies".
> The Plan of Record ("POR") and the follow-up letter filed with the
> Commission on January 7 and February 1, respectively, contain a limited
> indication of the specified industry standards which Ameritech Illinois
> intends to implement in its OSS. Such "standards" information should be
> provided for each of Ameritech Illinois' systems (e.g., pre-ordering,
> ordering, etc.) . . .

SBC/Ameritech's response is summarized in its transmittal letter with the current version

of the Plan:

> **Standards**   Additional information has been added to the Overview
> section to identify which industry standards bodies are
> creating standards that address the pre-ordering, ordering,
> provisioning, maintenance, and billing of resale and

> unbundled products. Information was also added
> reaffirming Ameritech Illinois' commitment to these
> standards in the Future Method of Operations section.

The issue posed by the Chairman, however, was not what standards *bodies* are creating

standards for the various OSS functions (information that is well-known to all), the issue

rather is what *versions* of the industry standards SBC/Ameritech intends to implement

and the extent to which SBC/Ameritech intends to conform to them in terms of the ways

that the interfaces operate to process CLEC orders. And contrary to SBC's statement in

the transmittal letter, the Future Method of Operations discussion in the Plan is as

unenlightening as was the previous version.[2]

The pre-ordering discussion in the POR now identifies the four functions that will

be added to the EDI interface next month,[3] and (as indicated in SBC/Ameritech's

previous "follow-up") it states that the interface will be updated to LSOG 4 in March

2001; secondly, it indicates that the March 2001 update will make CORBA available as

an alternative to EDI. Attachment A, at 28-29.[4] The addition of the CORBA interface is

a welcome move on SBC's part. But that says nothing about the functionality that will be

supported by Ameritech over the interface. As to both the EDI and CORBA interfaces,

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[2] For example, in the Overview section of the Future Method of Operation (FMO) discussion
SBC/Ameritech has added a paragraph stating that "[e]valuation of the appropriate industry
standards and guidelines was a major part of the FMO analysis" and that the planned
enhancements are "wholly consistent with" standards and guidelines of the industry standards
bodies. Attachment 1, p. 32. There follows a table in which SBC/Ameritech simply lists all of
the industry standards for pre-ordering, ordering and provisioning (for example, it lists OBF
LSOG 4 *and* OBF LSOG 5), without differentiation or specification as to which standard(s) apply
to which function. This level of generality is not helpful to the Commission or to CLECs,
because it does not identify which functionality Ameritech intends to implement in a compliant
fashion and where it intends to deviate from the industry standard.

[3] This update amounts only to making available electronically certain data that previously was
provided manually.

[4] SBC/Ameritech has also promised a GUI interface for the March 2001 update.

SBC/Ameritech is silent on the extent to which it will comply with the most recently ratified industry standards in order to provide feature rich and fully functional pre-ordering capabilities.

Similarly, with respect to ordering, SBC/Ameritech's Plan is vague to the point of being coy. It states: "In alignment with its commitment to industry standards and guidelines, Ameritech Illinois will be updating its application to application ordering interface to be *consistent* with the EDI 10 (LSOG 4) in August 2000." But in SBC/Ameritech's usage, "consistent with" is a far cry from "compliant with" the industry standards.

An industry compliant EDI 10/LSOG 4 interface gives CLECs numerous enhanced functionalities for ordering and pre-ordering. Appended to these comments as Attachment B is a list of the enhancements that are part and parcel of full EDI 10/LSOG 4 compliance. Ameritech's POR gives absolutely no confirmation, first of all, that any of these functionalities will be available to CLECs in an EDI 10/LSOG 4 compliant format in the August 2000 update to its ordering systems.[5] In fact, Ameritech in the most recent CLEC industry forum meetings held on February 16-19, 2000, provided CLECs with preliminary summaries of (as distinguished from specifications for) its August 2000 EDI rollout, and those documents make it all the more clear that Ameritech does not intend to offer *any* of these functionality enhancements in a EDI 10/LSOG 4 compliant format.[6]

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[5] The changes that have been described for the August update are in fact cosmetic, in that they involve adjustment of various data fields and field lengths.

[6] While Ameritech's current systems may in some instances offer CLECs other functionalities that are similar to those offered in EDI 10/LSOG 4, Ameritech does not offer those functions in a manner that is EDI 10 compliant. But the express objective of this Commission's merger conditions on OSS was to see that Ameritech offers industry-compliant interfaces. Patch-work

Similarly, the POR gives no hint as to what functions it will make available in the March, 2001 update to the pre-ordering system.

II. Functional Elements That Are Essential To Support Local Market Entry Are Missing From SBC/Ameritech's Plan

As discussed above, SBC/Ameritech's actual plans, to the extent they are known from other forums, reflect widespread departure from the industry standards (and specifically from LSOG 4/EDI 10, the standard to which SBC/Ameritech cites for preordering and ordering). These are not academic or trivial shortcomings relative to some abstract "ideal"; rather, SBC/Ameritech's Plan omits key elements that are needed for local entry on any scale. These elements have been made available in other jurisdictions, New York and Texas for example, where initial broad scale efforts at local entry are underway. They must be included in any OSS Plan for Illinois.

Integrated Pre-Ordering and Ordering

The FCC in its Order on the Bell Atlantic New York 271 application explained the need for integration of pre-ordering and ordering systems:

> The Commission has explained previously that a BOC with integrated pre-ordering and ordering functions must provide competing carriers with access to the same capability. In this regard, the BOC must enable competing carriers to transfer pre-ordering information electronically to the BOC's ordering interface or to the carriers' own back office systems, which may require "parsing" pre-ordering information into identifiable fields. Without an integrated system, a competing carrier would be forced to re-enter pre-ordering information manually into an ordering interface, which leads to additional costs and delays, as well as a greater risk of error. This lack of integration would place competitors at a competitive

procedures that allow CLECs to presently gain certain functionalities that are offered in EDI 10 does not mean that Ameritech has implemented an interface that complies with EDI 10.

disadvantage and significantly impact a carrier's ability to serve its customers in a timely and efficient manner.[7]

Integration of these systems requires a number of functions to be performed and capabilities to be made available – all of which are a part of the industry-standard, LSOG 4/EDI 10. First, as the FCC in its New York order references, the pre-ordering information (in Ameritech's case, the customer service record or "CSR" information) must be "parsed" into identified and defined "fields." As it is offered today, the pre-order information (name, address, telephone number, directory listings, services – all of the relevant information about the customer and the customer's current service) is furnished in the form of one large undifferentiated "data stream" or "paragraph" of information (technically referred to as concatenated); the elements are not provided in a format that conforms to the industry (LSOG/EDI) standards for the location and size of the relevant data fields. In order to allow for processing in an automated fashion, the **CSR** information must be **parsed**, rather than concatenated.[8]

Second, the data itself must be made uniform or **integrated** as between the pre-order and order processes. Information that Ameritech requires CLECs to include on the orders they submit is often data that Ameritech holds in its customer record database orvarious other Ameritech databases. CLECs of course must also submit information specifying the various service choices made by the end user. Where Ameritech's pre-ordering systems produce information that is incompatible in form, format and content to

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[7]Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, CC Docket No. 99-295, Memorandum Opinion and Order (released December 22, 1999), para. 137.

[8] See A Telecommunications Industry Forum TCIF Implementation Guideline For EDI Electronic Data Interchange; EDI LSOG Mechanization Specification 4; Section 7.4.2, "Customer Service Inquiry."

that which its ordering system requires from CLEC, those data are said not to be "integrated." The FCC recognized the problems that these data inconsistencies dichotomies created in New York and required Bell Atlantic to implement integrated pre-order and order systems in the paragraph cited above. This functionality, present in NY, must be provided if Ameritech is to satisfy its obligation to provide a fully compliant interface incorporating the latest industry approved standard (EDI 10/LSOG 4).

Fielded Completion Notices

Ameritech's legacy systems are constrained so that CLECs cannot know which parts of local service requests are completed on specific dates. A fielded completion notice, a function which is standard in LSOG 4, EDI 10, would advise CLECs when each part of a local service request is completed with specific dates. For orders of several access lines, for example, Ameritech may not be able to complete the order in one day, but Ameritech currently does not give CLECs a completion notice that would notify them when each portion of such an order is complete. Instead, CLECs are left in the lurch waiting for the final completion notice, which Ameritech only releases once all work is complete. For any order of any size, a CLEC cannot advise a customer regarding when each portion of its local service request is completed.

These constraints hinder the ability of CLECs to provide adequate service to their end users. When CLEC customers call to find out the completion status of their service requests, the CLEC is unable to convey any information until the entire request is completed by Ameritech. First impressions of the customer concerning the CLEC service are critical. The issue of the fielded completion notices, a standard function in

EDI 10/LSOG 4, should be part of the Plan of Record and certainly part of the collaborative sessions on OSS.

Flow Through

Ameritech's existing interfaces are designed in a manner that mixes industry-standard ordering formats with non-standard, Ameritech-specific conventions reflecting the way orders are processed in its legacy systems. CLEC orders do not "flow through" Ameritech's legacy systems to the same extent that Ameritech's retail orders do (Ameritech's retail orders are not processed through the interfaces, but instead are directly entered into its systems which distribute them in unspecified ways for processing), but instead drop out of the electronic process for varying degrees of manual intervention.

The experience that AT&T has had in entering the market in New York has confirmed once again that an inordinate amount of manual processing cannot sustain a commercially viable offering in the marketplace. In less than a year since the UNE-P became available in New York, Bell Atlantic is processing over 400,000 orders per month (a number which does not include the orders which it currently "loses" – which AT&T estimates to be in the range of 30% of new orders -- which are the subject of complaint proceedings pending in New York initiated by both AT&T and MCI WorldCom). When the incumbent must process over 20,000 orders per day, manual intervention required to fill even a small percentage of orders will be catastrophic. Consequently, it is essential to have a basic understanding of how orders flow through the incumbent systems, the circumstances under which orders do not flow through systems and how changes or enhancements to those systems will affect flow-through.

The extent to which orders are processed electronically versus manually is a product of decisions Ameritech has made in constructing its systems. CLECs need access to information concerning where their orders fall to manual handling and what on the CLEC's part causes orders to fall out of electronic processing. This information was essential to identifying flow through problems in both Texas and New York (and was provided in the context of the state proceedings by Bell Atlantic and SBC). Ameritech has refused to provide this information here, however. SBC/Ameritech took the same position with respect to the xDSL collaborative conducted under the auspices of the FCC; in his letter responding to issues raised in that collaborative, Mr. Lawrence E. Strickling, Chief of the Common Carrier Bureau of the FCC, discussed the flow-through issue in that context, stating:

> CLECs request that SBC describe how it will implement a real-time flow-through pre-ordering and ordering system for xDXL loops. To the extent that SBC's flow-through development plans for advanced services pre-order inquiries and orders require modifications to the OSS interfaces and/or business rules for pre-ordering and ordering loops used in advanced services, such plans are within the scope of the collaborative sessions under [the FCC's xDSL Merger Condition]. [9]

Similarly, flow-through should be a part of the OSS Plan of Record and addressed in OSS collaboratives in Illinois.

Hot Cuts

CLECs with their own switching and transport facilities commonly provide service to customers using UNE loops from the incumbent LEC. The conversion of such a customer entails the physical "cut-over" of the loop termination from the facilities of the ILEC to those of the CLEC. This activity obviously requires close coordination of

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[9] See Letter dated February 24, 2000 from Lawrence E. Strickling to Charles Foster, FCC DA 00-336, p. 3 (copy appended as Attachment C).

the activities of the two carriers in order to avoid loss of service to the customer. If the loop is disconnected from the ILEC's switch but not connected promptly to the frame of the CLEC, or if the telephone number is not properly ported to the CLEC, the customer will lose dial tone.

For example, AT&T sends UNE-loop orders to Ameritech with a date requested for the cut-over. Ameritech's systems do not provide for confirmation of the time of the cut-over (the so-called "cut frame due time"), however, and in fact under Ameritech's processes an order is only reviewed the day before the requested cut-over – by which time there may be inadequate personnel or facilities to perform the cut-over. Moreover, Ameritech unlike other RBOCs has not even attempted to institute reliable fail-safe hot-cut processes and the associated systems support for cutovers. It is essential that explicit and well-defined processes for "hot cuts" of UNE loops are implemented with the associated systems support. Such procedures have been made available by SWBT in Texas and PacBell in California as well as by Bell Atlantic and in fact all of the other RBOCs. Ameritech has refused all requests for such processes, however. They should be included in the OSS Plan of Record and in OSS collaboratives.

Business Rules And Systems on SBC/Ameritech's Side of the Interface

In its comments on the previous Plan of Record, AT&T requested that SBC/Ameritech make available information concerning the business processes and business rules associated with the systems on its side of the interface. SBC/Ameritech remain completely silent on this issue, maintaining the position that CLECs may not "look behind the curtain" at its systems. A number of the foregoing topics (in particular, business rules for complex order completion; flow-through) illustrate the need on the part

of CLECs for access to such information.   Included in the Plan of Record for OSS should be a requirement that Ameritech respond to requests for information from CLECs concerning business rules and systems on Ameritech's side of the interface so that CLECs can better tailor *their* systems and serve their customers.[10]

REQUESTED RELIEF

For the reasons set forth above, the Commission would be entirely justified in rejecting SBC/Ameritech's second attempt at a Plan of Record for OSS. The changes SBC/Ameritech have made are largely cosmetic, and as illustrated above their plans in crucial respects remain unspecified and incomplete.[11]

If the Commission concludes, however, that rather than rejecting the Plan again the more productive way to proceed would be to advance to the collaborative stage, it should make clear to SBC/Ameritech and the parties that the POR document does ***not*** limit the scope of the ensuing collaborative proceeding on OSS. In particular, as discussed in Section II above, there are numerous issues that need to be addressed with respect to SBC/Ameritech's pre-ordering and ordering systems, in particular, if those systems are to be minimally capable of supporting market entry on any scale. These

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[10] See Strickling Letter, para. 1 (at pp. 2-3)("Because [the xDSL merger condition] addresses forward-looking enhancements to the interfaces for pre-ordering and ordering components used to provide advanced services, SBC should identify when it will make access to all records, databases and back-end systems available to CLECs.")

[11] The document is also an inadequate response to the topics the Chairman in his letter of February 17. For example, the Chairman stated that SBC/Ameritech should supply specifics of their implementation of xDSL and advanced services, noting that its references to its FCC filings "do not provide the Illinois Commerce Commission with sufficient detail to examine Ameritech Illinois' implementation plans in this area." As noted above, the Chief of the FCC's Common Carrier Bureau has extended the xDSL collaborative and directed SBC/Ameritech to make numerous improvements to its xDSL Plan of Record; in any event, all that SBC has provided in the Illinois POR in response to the Chairman's request is a couple of paragraphs. See Attachment A, pp. 30-31, 34.

items were and are included in the OSS of SBC and other RBOCs such as Bell Atlantic for New York. The Commission should specify that these and other issues suggested by the CLECs are to be included in the OSS collaborative process.[12]

At a minimum, the Commission should make clear that the proper scope of OSS collaboratives is not delimited by SBC/Ameritech's Plan of Record. In the xDSL collaborative proceeding pursuant to the FCC's merger conditions, SBC/Ameritech took the position on issue after issue that if it was not expressly included in the POR (which, like this Plan, was SBC/Ameritech's document and was limited accordingly), then it was not properly an issue for the collaborative. See Strickling Letter, supra (Attachment C). Any Commission action "accepting" the Plan of Record should make explicit that the scope of the collaborative and future OSS enhancements are not limited to the Plan as presented by SBC/Ameritech, and that Staff and the CLECs are free to bring their issues to the collaborative process.

Finally, and once again, the Commission should require SBC/Ameitech to state what functionalities it intends to include in its versions of LSOG 4/EDI 10 for ordering and pre-ordering in the updates planned for August 2000 and April 2001, respectively. It should be required to provide this information in advance, so that CLECs will have it going into the OSS collaboratives.

The underlying issue that will have to be addressed is what systems work is needed at the outset to bring Ameritech's OSS up to par.[13] As the Chairman stated in the

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[12] It would be reasonable, for example, for the Commission to require SBC/Ameritech to address them in revisions to its Plan of Record before proceeding to a collaborative. In that way SBC/Ameritech would be given the opportunity to put forward their proposals on these items, along with proposed timelines, and the parties could then address the issues in the collaborative discussions.

Attachment to his February 17th letter: "In accordance with the Commission's Order in Docket 98-0555, the third party tester will design and perform the testing of the OSS in Illinois which result from the collaborative process." In workshops in Wisconsin, SBC/Ameritech has agreed that there are systems enhancements that will need to be made and implemented prior to OSS testing. It has agreed to a list of potential enhancements (including those discussed in Sec. II, above, and others), and it has agreed that questions as to which enhancements should be made prior to third-party testing should be decided as part of the collaborative (and if necessary by the Commission). SBC/Ameritech should not have an objection to proceeding in a similar manner here.

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[13] These are, after all, substantially the same systems that the FCC found to be deficient in the Ameritech Michigan 271 Order of *August of 1997*.